

February 28, 2013

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Ex Parte Communication in WC Docket 09-197

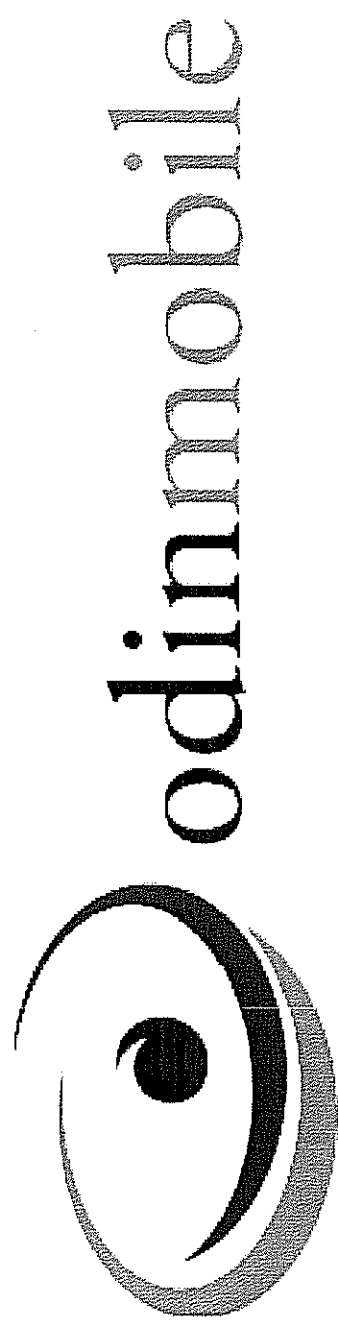
Dear Ms. Dortch:

On February 22, 2013, the undersigned counsel for Prepaid Wireless Retail, LLC, d/b/a Odin Mobile, met with Jonathan Lechter, Michelle Schaefer, Alex Minard and Garnet Hanly of the Wireline Competition Bureau's Telecommunications Access Policy Division, to discuss Odin Mobile's pending petition to be designated an eligible telecommunications carrier ("ETC") in the states for which the Commission has jurisdiction over wireless ETC designations.

At the meeting, we discussed Odin Mobile's target market, general business strategy, handsets, the impact of designating Odin Mobile an ETC on the Universal Service Fund and efforts with respect to compliance. Attached is a presentation provided to the staff.

Respectfully,

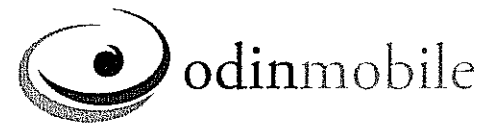
Robert Felgar
General Counsel of Odin Mobile



Presentation by Robert Felgar
February 22, 2013

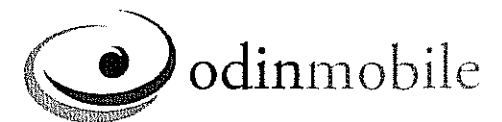
The Challenge

- Based on a survey of members of the Blinded Veterans Association, the following information was obtained:
 - 42% of BVA members do not use a cell phone at all (compared to 12% for the general population).
 - Only 15% of those who use a cell phone, use it for texting (72% for general population)
 - Only 11% of those who use a cell phone use it for email (50% for general population)



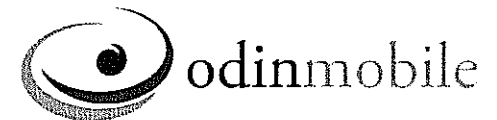
The Challenge

- Only 8% of those who use a cell phone, use it to access the Internet (56% for general population).
- Only 7% of those who use a cell phone, use it to download applications (43% for general population).
- Only 16% of those who have a cell phone, have a smart phone. In contrast, 53% of the total population that has a cell phone has a smart phone.



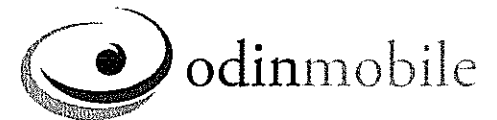
The Challenge

- The Commission has concluded that accessibility is a continuing challenge for the blind and visually impaired.
 - [F]eature phones continue to offer only limited accessibility for consumers who are blind or visually impaired. The record indicates that consumers who are blind or visually impaired have consistently and persistently expressed frustration with the overall inaccessibility of telecommunications equipment that has grown increasingly complex over time. In the Matter of Implementation of Sections 716 and 717 of the Communications Act of 1934, as Enacted by the Twenty-First Century Communications and Video Accessibility Act of 2010, Biennial Report to Congress as Required by the Twenty-First Century Communications and Video Accessibility Act of 2010, 27 FCC Rcd 12204, ¶ 39 (2012).



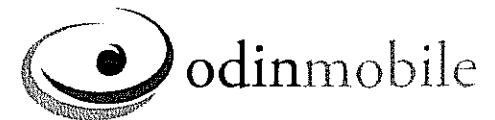
The Challenge

- The causes of low adoption rates include cost and lack of accessibility.
 - As of 2008, only approximately 43% of non-institutionalized persons with a visual disability, ages 16-24, were employed.
 - As of 2009, 32% of blinded veterans live on less than \$20,000 per year.
 - The blind cannot take full advantage of Lifeline. To Our knowledge, no wireless ETC offers accessible handsets. In many cases, ETCs do not allow customers to select their handsets.



Solution

- Odin Mobile will make available uniquely accessible handsets, a fully accessible website and customer service trained in the accessibility features of cell phones.
- Pricing plans tailored to users focused on basic voice service.
- Discounted service to those who qualify for Lifeline.



Impact on Universal Service Fund

- The impact on the Fund will be minimal.
 - The number of blind and visually impaired is relatively small.
 - Demand will be tempered by the fact that customers will have to pay for their handsets, a substantial expense.

Impact on the Universal Service Fund

- Duplicates will not be a problem.
 - The large majority of blind and visually impaired do not currently participate in Lifeline.
 - Customers will have to pay for their handsets. If a customer already has one or more Lifeline accounts, they will not want to pay Odin Mobile for an additional one (why pay when they can obtain service for free).
 - Other wireless ETCs do not offer accessible cell phones. Many do not even allow the customer to select their handset.

